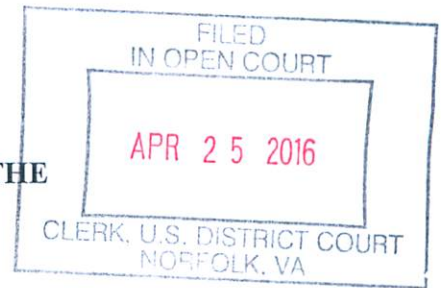


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA)

v.)

SOPHIA DIX,)

Defendant.)

Criminal No. 2:16cr32

STATEMENT OF FACTS

The parties stipulate that the allegations in Count One of the indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. From in or about April 2014, through in or about August 2015, in the Eastern District of Virginia, SOPHIA DIX, the defendant, devised a scheme to defraud the Social Security Administration, and to obtain money therefrom by means of materially false and fraudulent pretenses, representations and promises, as described below.

2. At all material times, DIX was employed by the Social Security Administration as a service representative at a district office in Norfolk, Virginia. She had computer access to Social Security Administration beneficiary information, including bank account data for the direct deposit of benefit payments into the bank accounts of beneficiaries.

3. The object of the scheme devised by DIX was to obtain monies for herself by fraudulently processing computer changes to Social Security Administration beneficiary account information so that benefit payments would be deposited directly into a prepaid reloadable debit card account that she opened at a financial institution in the name of a beneficiary.

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4. DIX fraudulently processed computer changes to the bank account information of approximately three separate Social Security Administration beneficiaries, so that benefit payments would be deposited directly into the prepaid reloadable debit card account that she opened in the name of another beneficiary.


5. DIX fraudulently made computer changes to the beneficiary accounts to indicate that the beneficiaries were entitled to benefits.

6. As a result of the scheme, DIX fraudulently diverted the total sum of approximately \$56,560.20 in beneficiary payments into the prepaid reloadable debit card account. DIX used those funds for her personal benefit.

7. On or about June 2, 2014, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice, DIX transmitted and caused to be transmitted, by means of a wire communication in interstate commerce, certain signs, signals, pictures and sounds, that is, an electronic transmission by computer from Norfolk, Virginia to the United States Treasury Department in Kansas City, Missouri, which processed a change in the direct deposit information of G.C.'s Social Security Administration beneficiary account.

8. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case.

DANA J. BOENTE
UNITED STATES ATTORNEY

By: 
Elizabeth M. Yusi
Assistant United States Attorney

U.S. v. SOPHIA DIX, 2:16cr32

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, SOPHIA DIX, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



SOPHIA DIX

I am SOPHIA DIX's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Suzanne V. Suher Katchmar, Esq.